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17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **SAN JOSE DIVISION**

20 ARIEL ABITTAN,

Case No. 5:20-CV-09340-NC

21 PLAINTIFF,

**DECLARATION OF  
KIRSTEN LEE SOARES**

22 v.

23 LILY CHAO (A/K/A TIFFANY CHEN, A/K/A  
24 YUTING CHEN), DAMIEN DING (A/K/A  
25 DAMIEN LEUNG, A/K/A TAO DING),  
26 TEMUJIN LABS INC. (A DELAWARE  
CORPORATION), AND TEMUJIN LABS  
INC. (A CAYMAN CORPORATION),

27 DEFENDANTS,  
28

1                   and  
 2       EIAN LABS INC.,  
 3                   NOMINAL DEFENDANT.

4           I, Kirsten Lee Soares, declare as follows:

5           1.       I have been a licensed private investigator in the State of California since October  
 6 of 2001. I have License No. PI22659. I make this declaration based upon my knowledge of the  
 7 facts stated herein, and if called to testify, I could and would testify competently thereto. I  
 8 submit this declaration in support of Plaintiff's Motion for an Order Allowing Defendants Lily  
 9 Chao ("Chao") and Damien Ding ("Ding") to be Served (1) Through Counsel, (2) Through  
 10 Temujin Labs Inc. (Delaware)'s Registered Agent, (3) by Text, or (4) by Publication.

11          2.       I was retained by two previous teams of counsel for Plaintiff Ariel Abittan  
 12 ("Abittan") to locate Lily Chao ("Chao") and Damien Ding ("Ding") for the purpose of serving  
 13 the summons and complaint in this action.

14          3.       Plaintiff initially provided me with the address 69 Isabella Avenue, Atherton, CA  
 15 ("69 Isabella Ave.") as the primary residence of Defendants, together with eight (8) other  
 16 addresses that Defendants claimed as their own secondary residential or commercial addresses,  
 17 including:

- 18                   •       133 Burns Avenue, Atherton, CA;
- 19                   •       70 Barry Lane, Atherton, CA;
- 20                   •       236 Park Lane, Atherton, CA;
- 21                   •       8 Faxon First, Atherton, CA;
- 22                   •       221 Atherton Avenue, Atherton, CA;
- 23                   •       350 Sharon Park Drive, Menlo Park, CA;
- 24                   •       2 Douglass Way, Atherton, CA 94027; and
- 25                   •       121 SW Salmon Street, Suite 1100, Portland, OR.

26          4.       Plaintiff also provided me with seven phone numbers that he had personally used  
 27 to communicate with Chao and Ding, including:

- (415) 568-0486
- (650) 284-6996
- (650) 334-8837
- (650) 382-9869
- (650) 850-9036
- (650) 937-9228
- (929) 251-3781

5. I conducted an extensive investigation into each of these addresses, phone numbers, and the person(s) or entities associated with them.

6. I accessed numerous commercial data sources, open source materials and subscription-based people finder and public record databases regularly used by private investigation firms, including TLOxp and LexisNexis.

7. I accessed the property data source First American DataTree and recorded property documents available through county governments in various jurisdictions.

8. I conducted traditional internet searches through various search engines and looked for open social media accounts.

9. I conducted a people search through IRB Search, an online provider of address histories and other background records, looking for the subjects under all of their known aliases.

10. I conducted searches at the office of the Recorder of San Mateo, the office of the Secretary of State of California, and the California Department of Motor Vehicles.

11. My associate, Robert Ferris, observed 69 Isabella Ave. on several occasions. He observed many ultra-luxury cars parked at this location and noted the license plate numbers of each car parked at the address. I then conducted an investigation at the office of the California Department of Motor Vehicles to determine the ownership of the vehicles and to look for traffic and vehicle violations associated with the vehicles.



1           12. I determined that many of the assets connected to Defendants—from houses to  
2 cars—are owned by different corporate entities. I subsequently investigated and reviewed the  
3 formation documents of each such entity at the office of the Secretary of State of California.

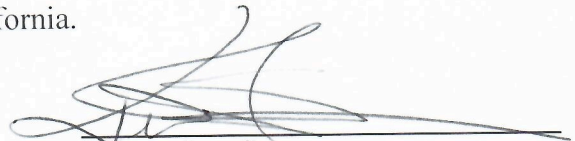
4           13. I also investigated and reviewed the formation documents of other entity names  
5 used by the subjects and provided to me by Plaintiff.

6           14. My investigation to date has failed to reveal a record of property ownership in San  
7 Mateo County, California in the name of Chao. I was also unable to find a record of property  
8 ownership in the name of Ding in San Mateo County, statewide, or nationally.

9           15. My associates and I spent more than 70 hours conducting in-person and electronic  
10 investigations to locate Defendants at significant cost to Plaintiff.

11           16. Despite these momentous efforts, I was not able to definitively identify assets in  
12 the names used by the Defendants in this declaration or to definitively locate the whereabouts of  
13 the Defendants.

14           17. I declare under penalty of perjury that the foregoing is true and correct. Executed  
15 on September 20, 2021 at San Francisco, California.

16  
17   
18 Kirsten Lee Soares